

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Shelly Pheigaru,

Plaintiff,

v.

Shell Exploration and Production
Company,

Defendant.

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CIVIL ACTION NO. 4:16-CV-03228

JURY TRIAL DEMANDED

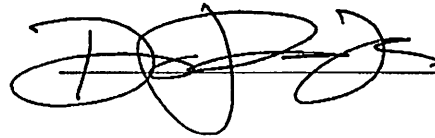
DECLARATION OF RANDY PETIT

1. "My name is Randy Petit. I am over the age of eighteen (18) years of age and am legally competent to testify to the facts set forth in this Declaration. All statements contained in this Declaration are true and correct and based on my personal knowledge.
2. During all relevant periods set forth herein, I have been employed as Team Lead, WRFM Technical Data Management at Shell Exploration & Production Company ("SEPCo"). My responsibilities include managing the Well Data Management team.
3. Shelly Pheigaru worked as a technical data management technician in the Well Data Management team. In connection with determining Ms. Pheigaru's individual performance factor ("IPF") (or performance ranking) for 2014, I completed an individual performance review feedback template, which was used in the performance ranking process. Ms. Pheigaru's performance ranking was based on her performance when she worked in 2014. Ms. Pheigaru's performance ranking was not reduced or pro-rated as a result of her leave of absence in 2014.
4. As a result of the economic downturn in the oil and gas industry, SEPCo made the decision to reduce its workforce. In the Well Data Management team, four employees, including Ms. Pheigaru, were impacted by the workforce reduction while six employees, Leah Camilli, Yanwen Fan, Luke Harkleroad, Steve Heying, Angelica Medrano, and Jody Tassin, were not impacted by the workforce reduction. Ms. Pheigaru ranked lowest within the Well Data Management team.
5. In selecting who would be impacted, SEPCo considered a number of factors, including performance, capabilities, demand for work/services, competencies, skills, and SEPCo's

short and long term organizational needs. David Schewitz, Karl Fleischmann, and I were involved in the decision to terminate Ms. Pheigaru's employment. In light of the above factors, the decision to terminate Ms. Pheigaru's employment as part of the workforce reduction was based on Ms. Pheigaru's lower level of sustained performance. The decision had nothing to do with Ms. Pheigaru's gender, pregnancy, leave of absence, or disability. I notified Ms. Pheigaru on July 14, 2015 that she would be terminated effective August 31, 2015.

6. I am a custodian of records for SEPCo and am familiar with the manner in which records of SEPCo are created and maintained by virtue of my duties and responsibilities. The exhibits attached to this Declaration are business records. The records are exact duplicates of the original records of SEPCo. The records were made at or near the time of each act, event, condition, opinion, or diagnosis set forth. It is the regular practice of SEPCo for these types of records to be made by, or from information transmitted by, persons with knowledge of the matters set forth in them. The records were kept in the course of regularly conducted business activity. It is the regular practice of the business activity of SEPCo to make the records.
7. I declare under penalty of perjury that the foregoing is true and correct."

Executed on May 8, 2017.



RANDY F. PETT JR.